

September 29, 2023

The Honorable Debbie Stabenow
Chairwoman, Senate Committee on
Agriculture, Nutrition and Forestry
328-A Russell Senate Office Building
Washington, D.C. 20510

The Honorable John Boozman
Ranking Member, Senate Committee on
Agriculture, Nutrition and Forestry
328-A Russell Senate Office Building
Washington, D.C. 20510

The Honorable Glenn “G.T.” Thompson
Chairman, House Committee on
Agriculture
1301 Longworth House Office Building
Washington, D.C. 20515

The Honorable David Scott
Ranking Member, House Committee on
Agriculture
1010 Longworth House Office Building
Washington, D.C. 20515

Dear Chairwoman Stabenow, Chairman Thompson, and Ranking Members Boozman and Scott,

The undersigned organizations appreciate the work of Congress in establishing the Good Neighbor Authority (GNA) which has allowed state forestry agencies, consulting foresters, and partners, working with the USDA Forest Service, to contribute to the restoration of federal forests on a scale never before realized. GNA allows the Forest Service to enter into agreements of up to ten years with state forestry agencies, Tribes, and counties to implement this critically important management work on national forests when the Forest Service is unable to do the work alone.

GNA has proven to be a tremendous success. Since GNA was first authorized by Congress with the 2014 Farm Bill, at least 38 states, 16 Tribes, and 15 counties have broken ground on over 380 GNA projects covering watershed restoration, vegetation management, wildlife habitat improvement, soil and water improvement, as well as reforestation and support for federal tree nurseries and seed orchards. Even with this level of success, more can be done to unlock the full potential of GNA as a cross-boundary restoration tool.

The intent of GNA is to benefit federal lands by increasing the pace and scale of restoration through partnership agreements with states, Tribes, and counties on federal forest restoration and management projects, facilitating critical work to improve species habitat, enhance watersheds, reduce hazardous fuels and mitigate wildfire risks. The 2018 Farm Bill removed the ability for states to further invest GNA project revenues for restoration services on non-federal lands within agreed upon GNA project boundaries. Adjacent state, tribal, county, private, and other land *that is essential to the health and productivity of national forests* can no longer be restored as a comprehensive landscape with revenues generated from GNA projects as a result of the limitations of the 2018 Farm Bill language.

Additionally, we would like to call your attention to the fact that without an extension of the 2018 Farm Bill authority which authorized states to retain GNA project revenue (P.L. 115-334, §8624), new GNA agreements and GNA agreement modifications executed after October 1st, 2023 will not be able to collect or expend GNA project revenues. Funding additional restoration with revenue is an important mechanism within GNA and is critical to ensure solvency of states and other entities such as Tribes and counties if they are provided the authority for retaining GNA project revenue. Any lapse in authorization, which will occur without a Farm Bill extension, could have cascading effects and lead to longer delays in project implementation.

GNA has been dedicated to serving the people of Michigan by providing increased timber production from the three national forests within the state. GNA project revenues generated from these efforts have provided the funding to enable other successful restoration projects within each of the national forests. These projects have focused on numerous activities, including invasive species mitigation and eradication, which has been, and will continue to be a major focus of the GNA program in Michigan.

Unfortunately, the way project revenues generated from the GNA program are being directed by language in the 2018 Farm Bill, these invasive species projects must stop at federal property boundaries when GNA project revenues are funding the work. This makes efforts to control and eradicate invasive species less effective in terms of cost and outcomes because the invasive species will continue to spread onto neighboring lands and in some instances enables more rapid spread. Examples include hemlock woolly adelgid and oak wilt control where treatment solely on federal lands resulted in the spread of invasive species from federal lands and onto neighboring lands. This is the opposite of being a “good neighbor”. Costs continue to accrue when the full infestation cannot be treated and that’s just the short-term economics. Long term, the decrease in biodiversity on the landscape from lack of invasive species treatment will erode the ability to maintain diverse ecosystems and timber production on national forest lands.

Another unfortunate example is purple loosestrife management on the Au Sable River watershed on the Huron Manistee National Forest. Purple loosestrife can rapidly establish and replace native vegetation, leading to a reduction in plant diversity, which reduces habitat value to wildlife. On the main branch of the Au Sable River, Michigan Department of Natural Resources (DNR) has been using GNA project revenues to treat populations on National Forest System (NFS) lands while skipping treatment on the adjacent private lands upstream. When treating invasive species along a moving waterbody, the focus should be on the upstream infestations to prevent downstream spread, as seeds, rhizomes and roots, and plant fragments can easily flow downstream. This cannot be accomplished with GNA under the current limitations with respect to treatment of project revenue.

Making GNA project revenues available for restoration efforts on neighboring public or private lands is not only good economics it is good for neighbors of federal lands. When invasive species

can be successfully eradicated in one area—the focus can then shift to other areas, thus making a greater impact on the ever-growing problem of invasive species on the landscape.

As another example of the current limitations to GNA with respect to the treatment of GNA project revenues created by the 2018 Farm Bill, we'd like to turn your attention to the attached map which highlights the Manitou River GNA project in Minnesota. The Manitou River GNA timber sale contains both Superior National Forest and state of Minnesota ownership. This joint timber sale is 104 acres in size and is composed of mixed stands of aspen, paper birch, white spruce, and balsam fir. The white spruce and balsam fir species have considerable damage due to an outbreak of spruce budworm over the last few years. The stands are located within the Manitou River watershed, with the Manitou River, a designated trout stream, directly to the south, and numerous trout stream tributaries in the area. The post-harvest regeneration plans are to prepare the site for planting through rock raking and planting a mix of long-lived conifer.

This map is a good representation of the complex mix of land ownerships, commonly referred to as “checkerboard” or “matrix” which is typical around the boundaries of national forests across the country. As you can see in this example, the diagonal lines indicate timber sale boundaries on federal lands which are represented on this map by green areas. The timber sale project surrounds a county administered parcel (brown), and many parcels of land administered by the state of Minnesota (purple) are intermixed. A network of forest roads intersects all these lands to provide access for active management, recreation, and fire suppression.

Due to the restrictive language in the 2018 Farm Bill, the Minnesota DNR and other state forestry agencies facing similar circumstances, will not be able to use GNA project revenues generated from these timber sales for post-harvest site preparation and tree planting, updating culverts on forest roads that provide access for the timber sale, or other restoration activities on non-federal lands within the GNA project boundary. Continuing the restoration projects across ownership boundaries within the identified GNA project boundary would benefit the ecology of the trout streams and allow for the complete restoration of this comprehensive landscape under a single GNA project—irrespective of arbitrary ownership boundaries—and all within the boundaries of this agreed upon GNA project area. Once the portion of the timber sale project is harvested on state ownership, Minnesota DNR will plan to fund follow up treatments on the state-owned portion of the timber sale using state funds. Because GNA project revenue can't be applied across ownerships, treating these acres will require a separate contract and reforestation plan than the adjacent NFS lands. Because this limitation creates inefficiencies and higher costs for landscape level planning and treatment, less restoration is likely to be accomplished.

From a scientific and ecological perspective this makes absolutely no sense, and from a policy and good governance perspective, supporting this statutory limitation is untenable. This is why in part, the *Treating Tribes and Counties as Good Neighbors Act*—which would rectify this limitation—won immense bipartisan support in the House of Representatives, garnering 98 votes in support

and zero opposed from Democrat and Republican members of the Agriculture and Natural Resources Committees, and recently passed in the House of Representatives by a voice vote.

We respectfully call on you as leaders of the House and Senate Agriculture Committees to fix GNA in the 2023 Farm Bill to fully unlock its potential as a cross boundary restoration tool. Since authorization twenty-two years ago in 2001 as a pilot program for NFS lands in Colorado (P.L. 106-291 §331), GNA has proven to be an effective tool for increasing the pace and scale of forest restoration on federal lands. The time has come to strengthen and permanently authorize all aspects of this time-tested program.

We urge you to consider these impending impacts and request you include an extension of the 2018 Farm Bill authority mentioned above in any continuing resolution or other legislative vehicle, to provide certainty and support for this important forest restoration authority.

Thank you for your outstanding leadership on forestry issues and for your steadfast dedication to improving the health, resiliency, and productivity of all America's forests as you work to pass the 2023 Farm Bill.

Sincerely,

American Forest Foundation	National Association of State Foresters
American Forest Resource Council	National Deer Association
Association of Consulting Foresters	National Wild Turkey Federation
Boone and Crockett Club	National Woodland Owners Association
Catch-A-Dream Foundation	PotlatchDeltic
Congressional Sportsmen's Foundation	Rayonier
Empire State Forest Products Association	Resource Management Service, LLC
Federal Forest Resource Coalition	Ruffed Grouse Society--American Woodcock Society
Forest Resources Association	Salt River Project
Indiana Forestry & Woodland Owners Association	Society of American Foresters
Massachusetts Forest Alliance	Sonen Capital
Michigan Forest Association	Theodore Roosevelt Conservation Partnership
Minnesota Forestry Association	White Oak Initiative
National Association of Counties	Wildlife Mississippi
National Association of Forest Service Retirees	